

Scott Freeman MD et al. v. Stephen Hurst et al.

2:22-cv-01433-RFB-MDC

Stipulation and Order to Extend Briefing Schedule – Second Request

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10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 SCOTT FREEMAN MD, individually and as
13 trustee for the SCOTT MITCHELL FREEMAN
14 REVOCABLE LIVING TRUST, dated March 10,
2012, for itself and as assignee of FERDINAND
BELGA,

15 Plaintiff,

16 *v.*

17 STEPHEN HURST; NICO FORTE; CERUVIA
18 LIFESCIENCES f/k/a CH TAC, LLC f/k/a
SAVANT TAC, LLC; CAREY TURNBULL;
19 RUSSELL BURBANK; BPM LLP; SAVANT
HWP, INC.; SAVANT HWP HOLDINGS, LLC;
20 and SAVANT ADDICTION MEDICINE, LLC,

21 Defendants,

22 *and*

23 SAVANT ADDICTION MEDICINE, LLC;
SAVANT HWP HOLDINGS, LLC; and
24 SAVANT HWP, INC.,

25 Nominal Defendants.

Case No. 2:22-cv-1433-RFB-MDC

**Stipulation and Order to Extend
Briefing Schedules – Second
Request**

Stipulation and Order to Extend Briefing Schedule – Second Request

1 **WHEREAS**, the Court previously extended the time to the below pleadings in
2 light of the Parties' settlement negotiations. *See* ECF No. 208.

3 **WHEREAS**, the undersigned parties are engaged in active settlement negotiations
4 to fully resolve all claims and defenses and desire to conserve resources during said
5 negotiations.

6 **WHEREAS**, Plaintiff and Defendant Hurst have discussed a general framework
7 for a settlement. However, the parties must complete their set up of a data room for
8 confidential documents to be exchanged for the necessary due diligence as part of the
9 settlement terms. Thereafter, the parties intend to negotiate a global settlement with all
10 parties. To facilitate these settlement negotiations, the Parties have also agreed to a 30-day
11 stay of discovery (pending approval by the Court) and similarly wish to conserve resources
12 related to the below briefing schedule for the same reasons.

13 The undersigned parties therefore present the following proposed schedule.
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1 **IT IS HEREBY STIPULATED AND AGREED**, by and between the
2 undersigned parties, by and through their respective counsel of record, that they will adhere
3 to the revised briefing schedule set forth below:

4 Event	Current Date (ECF No. 208)	New Date
5 Answer or Response to 6 Third Amended 7 Complaint for 8 Savant LLCs	Sept. 20, 2024	Monday, October 21, 2024
9 Opposition to Motion 10 to Disqualify	Sept. 27, 2024	Monday, October 28, 2024
11 Opposition to Nico 12 Forte's Motion to 13 Dismiss	Sept. 27, 2024	Monday, October 28, 2024
14 Opposition to Ceruvia 15 and Turnbull's Motion 16 to Dismiss	Sept. 27, 2024	Monday, October 28, 2024
17 Response, Answer, 18 and/or other Motions 19 related to Hurst's 20 Counterclaim	Oct. 4, 2024	Monday, November 4, 2024

21 **IT IS FURTHER STIPULATED AND AGREED**, by and between the
22 undersigned parties, and through their respective counsel of record, that any reply briefs
23 associated with the extended deadlines will be filed in the normal course.
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Respectfully submitted this 17th day of September 2024.

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ORDER

IT IS SO ORDERED.

United States District Judge/
United States Magistrate Judge

Dated: 9/19/24

Case No.: 2:22-cv-01433-RFB-MDC

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of September 2024, a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND BRIEFING SCHEDULES - SECOND REQUEST** was served by the following method(s):

- ☒ **Electronic:** by submitting electronically for filing and/or service with the United States District Court District of Nevada's e-filing system and served on counsel electronically in accordance with the E-service list to the following email addresses:

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